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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9
10 In re DMCA Subpoena to Google LLC, D/B/A
YouTube

Misc. Case No.:

11 **REQUEST FOR DMCA SUBPOENA
TO GOOGLE LLC, D/B/A YOUTUBE
PURSUANT TO 17 U.S.C. § 512(H)**

13
14 Petitioner Zhenjing Kuang (“Petitioner”), through his undersigned counsel of record,
15 hereby requests that the Clerk of this Court issue a subpoena to Google LLC, D/B/A YouTube
16 (“YouTube”) to identify the alleged infringer at issue, under the Digital Millennium Copyright
17 Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). The proposed DMCA Subpoena
18 is attached as Exhibit A.

19 The DMCA Subpoena is directed to YouTube. YouTube is the service provider to which
20 the subject of the subpoena posted infringing content (the “Content”). The Content was posted on
21 YouTube under the channel “Naughty Monkeys-2118” by the user “@NaughtyMonkeys.”

22 The Content infringes Petitioner’s exclusive rights under copyright law. Petitioner is a
23 popular content creator and Petitioner is pirating Petitioner’s videos and using them for the
24 Content despite the videos being originally created and owned by Petitioner, with multiple videos
25 even having Petitioner personally in the videos. *See* Declaration of David Silver dated September
12, 2024 (“DS Decl.”).

1 Petitioner has satisfied the requirements for issuance of a subpoena under 17 U.S.C. §
2 512(h), namely:

- 3 1. Petitioner has submitted a copy of a notification sent by Petitioner or on its behalf
4 under 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Declaration of David Silver;
- 5 2. Petitioner has submitted the proposed DMCA Subpoena attached hereto as Exhibit
6 A; and
- 7 3. Petitioner, through its counsel of record, has submitted a sworn declaration
8 confirming that the purpose for which the DMCA subpoena is sought is to obtain
9 the identity of an alleged infringer, and that such information will only be used for
10 the purpose of protecting Petitioner's rights under Title 17 U.S.C. § 101 *et seq.*

11 Petitioner respectfully requests that the Clerk expeditiously issue and sign the proposed
12 DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4).

13
14 Dated this 12th day of September 2024.

15 **BAYRAMOGLU LAW OFFICES LLC**

16
17 By: /s/ David Silver
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